

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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ALISON C. ABULAFIA, PETER W. BEADLE,  
JESSE LAYMON, MARIA D. KAUFER, and  
RICK ECHEVARRIA,

Plaintiffs,

Case No. 20-cv-3547

- against -

**ORDER TO SHOW CAUSE**

STEVEN RICHMAN individually and as General Counsel  
of the NYC BOARD OF ELECTIONS, MICHAEL RYAN,  
as Executive Director of the NYC Board of Elections,  
JOHN WM. ZACCONE, as  
President of the NYC Board of Elections,  
PATRICIA ANNE TAYLOR, as Secretary of the NYC  
Board of Elections, and JOSE MIGUEL ARAUJO,  
MIGUELINA CAMILO, JOHN FLATEAU,  
MICHAEL MICHEL, SIMON SHAMOUN,  
ROBERT SIANO, TIFFANY TOWNSEND, and  
FREDERIC M. UMANE, as Commissioners of the NYC  
Board of Elections, and the NYC BOARD OF  
ELECTIONS,

Defendants

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Upon the Verified Complaint, sworn to on May 6, 2020, and the exhibits annexed thereto,  
and the Declaration of Arthur Schwartz made May 6, 2020, and good cause being shown therein, it  
is hereby

ORDERED that Defendants Show Cause before this Court, before the Honorable  
\_\_\_\_\_, United States District Court, 500 Pearl Street, New York,  
New York, on the \_\_\_\_ day of May, 2020, at \_\_\_\_\_, why this Court should not enter an  
order:

(a) declaring valid the petitions designating

1. Plaintiff Alison C. Abulafia, as a Candidate for the Female District Leader Position in the 28th Assembly District Part B , Queens County, New York, in the Democratic Party Primary Election to be held June 23<sup>rd</sup> 2020;

2. Plaintiff Peter W. Beadle, as a Candidate for the Male District Leader Position in the 28th AD Part, Queens County, New York, in the Democratic Party Primary Election to be held June 23<sup>rd</sup> 2020;

3. Plaintiff Jesse Laymon as a Democratic State Committee and Delegate to the Democratic Party Judicial Convention in the 37<sup>th</sup> Assembly District ,Queens County, New York, in the Democratic Party Primary Election to be held June 23<sup>rd</sup> 2020; and

4. Plaintiff Marie D. Kaufer, as a Candidate for the for the Democratic Party Judicial Convention in 28<sup>th</sup> Assembly District, Queens County, New York, in the Democratic Party Primary Election to be held June 23<sup>rd</sup> 2020;

5. Plaintiff Rick Echevarria is a candidate for City Council in the 37<sup>th</sup> City Council District in Brooklyn, New York in the Democratic Party Primary Election to be held on June 23, 2020;

(b) directing Defendants to place the names of Alison C. Abulafia, Peter W. Beadle, Jesse Laymon, Maria D. Kaufer, and Rick Echevarria upon voting machines and ballots to be used at the Democratic Primary Election in the appropriate jurisdictions, to be held on June 23, 2020; and

(c) granting such other relief as the Court may deem appropriate; and

IT IS FURTHER ORDERED that Respondent Board of Elections of the City of New York shall produce upon the hearing of this Order to Show Cause, the designating petitions submitted by the Plaintiffs for the candidate positions in question, all Cover Sheets and Notices related to those

petitions, and the minutes of any Board or Board Committee proceeding concerning said petitions, together with all other printed and computer documents relating thereto; and

IT IS FURTHER ORDERED that pending the hearing and determination of this motion, the Defendants are restrained and enjoined from disseminating any absentee ballots in the 28<sup>th</sup> and 37<sup>th</sup> Assembly Districts in Queens County, or in the 37<sup>th</sup> NYC Council District for said Primary Election: and

SUFFICIENT CAUSE APPEARING THEREFORE, it is further

ORDERED that service of a copy of this Order, together with a copy of the Verified Petition, on Defendants be made by leaving a copy of said Order and Verified Complaint at the General Office of Respondent Board of Elections of the City of New York at 32 Broadway, New York, New York, **OR** in light of the public health emergency currently existing, by electronic mail to [serviceNYCBOE@boe.nyc](mailto:serviceNYCBOE@boe.nyc) with the caption of the case and the docket number placed in the subject line of the email, with the auto-reply confirmation email to serve as an exhibit to the proof of service, with an emailed copy to Steven Richman, General Counsel of the NYC Board of Elections.

Dated: May \_\_\_\_\_, 2020

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United States District Judge